

CTE 1005  
ORIGINAL

FILED

FEB 28 2002

CLERK, U.S. DISTRICT COURT

By

Deputy

In the United States District Court for the Northern District of Texas  
Dallas Division

(USA and )  
Jamal Elhaj-Chehade  
Co- plaintiff

Vs.

3:01-CV-01301-L

Educational Commission for Foreign Medical Graduates  
Et al entities and individuals) Defendants

Plaintiff's motion to amend the complaint. (complaint included)

February 28, 2002

I-Introduction

The plaintiff defines the use of ECFMG as the Educational Commission for Foreign Medical Graduates entities and individuals and includes all variant or alternative or equivalent names, persons, offices and properties and supporters and sponsors and endorsers of their activities or any other alternative.

II

Comes now on this date the plaintiff is filing his motion to amend the complaints as follow

Complaints:

- 1- The defendants abused the 501(3)© code, including scamming the U.S. government( a party of interest), the public(and the plaintiff) in taxes and fraud and embezzlements of funds and the inappropriate usage and misallocation of funds.
- 2- The defendants provoked the violations of the plaintiff's constitutional rights by their hired guns and other parties to influences, Exparte Communication and otherwise and influence the court as to deprive the plaintiff the due process and the proper protection of the laws and subjecting the plaintiff to double jeopardy and other clause and expost facto.( the plaintiff without waiving any right or claim, refrain from listing names as ordered by the previous court order)
- 3- The defendants **retaliated** against the plaintiff and stated through intimidation that they will continue to retaliate against the plaintiff for being a **whistleblower** and they stated that they will influence the court to deprive him any easy or proper access to the court by subjecting the plaintiff to extreme fees and bonds prior to filing any litigation in the future, and the defendants clearly stated their intention of future violation and retaliations and other actions against the plaintiff.
- 4- The defendants violated the terms and agreements and treaties and compacts and trades under which the defendants were created and under which they owe obligations toward the plaintiff and provoked the Courts and other parties in Texas and elsewhere to violates treaties and compacts that caused harms to the plaintiff.
- 5- The defendants( by or through third parties) were the cause and the provoking agents to the violation NAFTA agreement and other agreements( this should serve as a

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motion for the court to accept the jurisdiction and consolidation over this matter or to transfer this claim to the appropriate court in Washington DC)

- 6- The defendants engaged in unfair trade /labor practices, price fixing and the use of funds fraudulently acquired under false claims and pretenses to further violate other US and states and local and international laws and obligations toward many parties including the plaintiff.
- 7- The defendants subjected the plaintiff to various forms of intimidation and profiling( racial, ethnic, origin, social etc...) and prejudice( directly and indirectly) and caused harm to the plaintiff
- 8- The defendants threatened the plaintiff that more bad things are yet to come against the plaintiff.
- 9- The defendants violated some Texas codes of 501(3)-(C ) and laws ( this should serve as motion to consolidate along as they arise out of same circumstances and in which the plaintiff is entitled for further supplementary reliefs and reduce the costs of litigations and enhance the efficiency of justice

#### **Jurisdiction Statement**

- 10- The plaintiff asserts that this court does have the jurisdiction over the matters(Except where indicated or/and motion included to consolidate), as federal question claims, in which the US is a party plaintiff in some claims. and amount reliefs requested are all at the federal level.

#### **Reliefs**

- 11- **the assurance and the protection of the United States interests and the people interests against the defendants ( to be assessed later) and**
- 12- The plaintiff asserts that as a result of the defendants actions committed or obligations omitted and deceptions, the plaintiff was subjected to undue burden and severe or aggravation of the plaintiff's conditions that caused the plaintiff the deprivation of sleep, alienation from society, from profession, and affection, lack of enjoyment of life and property and missed opportunities and severe mental anguish and emotional distress and increase the dimensions of the plaintiff's injuries (the plaintiff was injured as provider and as a consumer and as a part of various communities, local state, national and international) for which the plaintiff is entitled for reliefs in earning potentials, seniority, advancements, excellence, perks, benefits, integration into the society and deprivation of the pursuit of happiness. In the amount of treble the amount of earning potential of an average specialist (3 times 400,000 USS for each year lost) prospective and retrospective. And this should continue until the plaintiff is licensed without any limitation to practice and without any interference from the defendants( and their allies and sponsors and hired or purchased gunners)

- 13- That because the defendants violations were malicious, premeditated or/and repetitive a punitive damages of 400 million dollars against the defendants as stop their abuse and put an end to their intimidation.
- 14- The plaintiff is further entitled to 120 million dollars in pain and suffering for and subject to hostile and toxic environment and undue burden.
- 15- And Because the plaintiff loves the US Constitution and the principle of this beloved Nation. the plaintiff did suffer further damages and anguish when the defendants did and continue to show lack of any consideration to the US Supreme laws of the land. For which the plaintiff is suffering from flashbacks and haunted memories that are hard to forget because of severed expectations and disappointments. The plaintiff is asking the court that the defendants pay a Symbolic amount of one thousand dollars to the construction of a monument(s) of US Servicemen heroes who died defending the Constitution and the principles of this beloved Nation, as a reminder.
- 16- The plaintiff is asking the court to have the defendants pay bonds in the amount of one hundred thousand dollars to be used by the plaintiff in the future to pursue further litigations (if needed should the defendants further retaliate or subject the plaintiff to additional hardships).
- 13-The plaintiff is further asking the court that the defendants pay to the plaintiff all reparatory/ remedial costs for the costs incurred by the plaintiff while trying to claim his life, home, and career back and this include but not limited all the legal costs, educational and travel and social expenses and any other expenses as they may arise past, present and future and that the defendants pay additional amounts for injuries done( also by other parties, defendants or not) as result of the plaintiff inconvenience that he is going through past , present, and future
- 17- In addition, the court must understand that the plaintiff is entitled to all forms of relief from the defendants (and their sponsors and supporters) regardless of whose name is mentioned as a defendants, and that the plaintiff not naming other defendants is done without any waiver to any right or claim or relief whatsoever, the plaintiff is simply complying with the court order that refused to include other parties or names in the past.
- 18- The plaintiff is also demanding that the defendants cease their hostilities against the plaintiff immediately and act side by side with the plaintiff in reversing some or all the damages and injuries done. Should the defendants fail to do so, additional exponential reliefs( to be assessed later) be awarded to the plaintiff for the defendants malignant behavior.
- 19- The plaintiff asserts that some damages are still reversible if the defendants are wishing to reverse them such as those that are considered double jeopardy and ex-post facto etc. and that failure on the part of the defendants to reverse them is self explanatory to the court for which the plaintiff is entitled for additional reliefs for aggravating conditions.

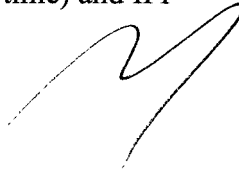
- 20- The plaintiff is entitled to additional non-overlapping reliefs under federal, state, international and other clause for which the plaintiff does have the right to pursue.
- 21- The court may award the plaintiff any additional reliefs non mentioned in the complaint, tangential and non tangential and otherwise.
- 22- The plaintiff is demanding a conference before judge(s) in which he will present whatever he has in evidences and trial be done SOLELY by jury. and that the defendants admitted to every element of every claim brought against them, in this case and in the case 3:99 CV 680-D/BC, in the public records of their tax files, their own words and publications, correspondences, and in the previous court cases that the defendants were a party or a plaintiff ( see also the plaintiff previous filing on January 7<sup>th</sup> 2002 requesting a conference before judges).

**Certificate of service:** this is to certify that this filing was done after the conference and notice of February 19, 2002 and February 25 and 26, 2002 that a true copy of the foregoing was sent to the defendants attorney Mrs. Susan Schwartz at 6688 N Central Expway # 850 Dallas Texas 75206-3913 on the day of 28<sup>th</sup> February, 2002 via USPS and e mail to the defendant attorney

Respectfully submitted to the Honorable Judge Sam Lindsey

Plaintiff Dr Jamal Elhaj-Chehade, pro-se( at this time) and IFP  
5414 Cedar Springs# 806 Dallas, Texas 75235.

Plaintiff's e mail **heyjam7@yahoo.com**  
Order is included.



**In the United States District Court for the Northern District of Texas  
Dallas Division**

**(USA and )  
Jamal Elhaj-Chehade  
Co- plaintiff**

**Vs.**

**3:01-CV-01301-L**

**Educational Commission for Foreign Medical Graduates  
(entities and individuals) defendants**

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**Order Granting the Plaintiff's Motion to Amend the Complaint**

Comes upon me the timely filed plaintiff's motion to amend the complaint. Upon Consideration, the court **grants** the motion.

It is so ordered On-----2002

**Honorable Judge Sam Lindsey**